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Richard Denison
<rdenison@environmentaldefense.org>
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To: ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, Wendykoch@eponallc.com
cc: Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc:
Subject: Environmental Defense comments on Phosphorous Acid, Triphenyl Ester, Reaction Products with Dipropylene Glycol (CAS# 116265-68-o)

(Submitted via Internet 6/2/06 to _____
_____ and
Wendykoch @eponallc.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Phosphorous Acid, Triphenyl Ester, Reaction Products with Dipropylene Glycol (CAS# 116265-68-o).**

Chemtura Corporation, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for phosphorous acid, triphenyl ester, reaction products with dipropylene glycol. The sponsor notes that this substance is also known as 3,6,8,11-tetraoxa-7-phosphatridecane-1,13-diol, 7-[2-(2-hydroxymethyl ethoxy) methylethoxy] tetramethyl-, represented by a different CAS #, 36788-39-3. According to this submission, this chemical is used as a secondary antioxidant in a number of plastic formulations and in synthetic rubber, which are used in numerous consumer products. It may also be used as a lubricant additive.

The test plan clearly and concisely describes available data and needed testing. The robust summaries consist of IUCLID database entries previously submitted as part of the European Risk Assessment Program on Existing Substances. Additional studies are proposed to address those SIDS elements that are not adequately addressed by current data.

This submission is nearly complete. The only additions we would suggest are to provide a structural formula and some additional detail in describing some studies summarized in the IUCLID document. For example, descriptions of studies in the IUCLID document should include the dose range studied and number of animals exposed in each dose range.

In summary, with minor revisions noted above, this submission is an acceptable submission to the HPV Challenge.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense